

MALCOLM S. SEGAL - 075481
KIMBERLY A. URIE - 133992
SEGAL & KIRBY
770 L Street, Suite 1440
Sacramento, CA 95814
Telephone: (916) 441-0828
Facsimile: (916) 446-6003

OK/HAV

Attorneys for Defendant
FRANCES MORADA

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CASE NO. S-03-376-DFL

Plaintiff,

**STIPULATION AND PROPOSED
ORDER REGARDING STATUS
CONFERENCE CONTINUANCE**

vs.

FRANCES MORADA,
LILY MIZRAHE

Defendants.

Defendant Frances Morada, through her counsel of record, Malcolm Segal and Defendant Lily Mizrahe, through her counsel of record, Bruce Locke, and plaintiff United States of America, through its counsel, Assistant United States Attorney Daniel S. Linhardt, agree and stipulate that the status conference set for September 15, 2005 may be continued to November 17, 2005 at 10:00 AM, in order to permit the parties to further investigate, review and discuss the case regarding future proceedings. This case continues to be complex within the meaning of the Speedy Trial Act due to the volume of discovery, complexity of the legal and factual issues, and the need of counsel to conduct independent investigations.

Accordingly, the time between the scheduled court appearance on September 15, 2005 and the status conference on November 17, 2005 should continue to be

1 excluded from the calculation of time pursuant to the Speedy Trial Act, due to
2 complexity and counsels' need to prepare. 18 U.S.C. §3161 (h) (8) (B) (ii) and (iv)
3 [Local Codes T2/T4].
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5 Dated: September 8, 2005

SEGAL & KIRBY

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8 By: /s/ Malcolm S. Segal
MALCOLM S. SEGAL
Counsel for Defendant Frances Morada
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11 Dated: September 8, 2005

MOSS & LOCKE

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14 By: /s/ Bruce Locke
BRUCE LOCKE
Counsel for Defendant Lily Mizrahe
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17 Dated: September 8, 2005

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19 By: /s/ Daniel S. Linhardt
DANIEL S. LINHARDT
Assistant United States Attorney
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22 **IT IS SO ORDERED.**

23 Dated: 9/9/2005

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25 /s/ David F. Levi
HONORABLE DAVID F. LEVI
Chief Judge, United States District Court
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